

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA:

V.

Case No. 21-00049

Matthew Erausquin :

MOTION TO EXTEND VOLUNTARY SURRENDER DATE
UNTIL JULY 18 AND REQUEST FOR TRAVEL TO THE PRISON

MATTHEW ERAUSQUIN, by and through counsel hereby moves to extend his surrender date from June 1, 2022 until July 18, 2022 so he can complete scheduled medical treatment. He also requests permission to travel to Terminal Island FCI to surrender himself. He will travel with his mother (his third party custodian) to the prison. Please consider the following:

1. Mr. Erausquin was sentenced on March 18, 2022. He received a surrender date of June 1, 2022. The court allowed him to voluntarily surrender.
2. Matthew was been attempting to treat his various conditions before his surrender date, however, he has a few remaining necessary treatment issues to take care of.
3. As noted in the attached letter, Mr. Erausquin in scheduled for a back procedure on June 29, 2022. He attempted to move this appointment, but

that is the soonest it could be done. The doctor's office requests his surrender date be extended six weeks so Matt can have the procedure and recover. The procedure is called a spinal ablation which is a procedure that cauterizes the nerves at the affected segments of the spine and can provide relief. This is the last procedure short of a full fusion surgery. Having the procedure done now will likely save BOP a fair amount if a fusion had to be done while he is incarcerated.

4. Moreover, Mr. Erausquin is currently on Remicade, an intravenous infusion treating Crohn's disease. The treatment has been successful but shuts down the immune system. Right now, Terminal Island is at a Covid-3 outbreak level (severe) and it seems to make sense to allow the situation six more weeks to settle down.
5. Finally, Matt had complications from his prostate surgery and may require additional treatment or procedure. He has an appointment scheduled there on June 6.
6. Therefore, we are asking for a six week extension with a new turn in date of July 18, 2022 at Terminal Island. Probation had requested medical information prior to determining its position. It does not seem like an enormous request given the circumstances.

7. Finally, given Matt will have to travel to California to report (as permitted by previous Court order) we are asking the Court to specifically Order his GPS can be removed as he will be in the company of his mother for his surrender or certainly the GPS could be removed once he arrives at the prison. The attached proposed Order leaves it up to probation as to when the GPS can be removed.

Matthew Erausquin
By Counsel

_____/s/_____

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Certificate

I hereby certify a true copy of the foregoing was filed with the Court's ECF system which system will then deliver notice to the Office of the United States Attorney on this 26th day of May, 2022.

____/s/_____

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